

William H. Shaevel
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August 27, 2004

MUR # 5527

Office of General Counsel
Federal Election Commission
999 East Street, N.W.
Washington, D.C. 20463

RE: Complaint Against Morse for Congress Committee
FEC ID #C00388595

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

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Dear Office of General Counsel:

Please accept this letter as a formal complaint under the Federal Election Campaign statutes against the Morse for Congress Committee, 258 Harvard Street, Unit No. 240, Brookline, MA 02446 (hereinafter referred to as "Morse Committee").

I, William H. Shaevel, of 141 Tremont Street, Boston, MA 02111 am filing this complaint as a representative of the Barney Frank for Congress Committee, 29 Craft Street, Suite 374, Newton, MA 02458.

This complaint covers the recurrent unwillingness and inability of the Morse Committee to comply with the full reporting requirements covering contributions and expenditures in spite of repeated requests from the Commission. It was hoped by us that the Morse Committee would voluntarily comply with the Commission's request. However, in light of the last report filed by the Morse Committee and the Committee's apparent unwillingness to comply with Commission requests (we can find nothing on record as filed), we were left with no option but to file a formal complaint to secure the necessary statutory disclosure required.

The following are our specific complaints:

A. CONTRIBUTIONS

1. INTRODUCTION: As you are aware, all contributions \$200 and over must be itemized in the reports disclosing the amount, name, address, occupation and employer. The concept for this disclosure is to inform the

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public about the source of a candidate's financial support. The following items are blatant examples of non-compliance even after notice from the Commission.

2. REPORTS INCORRECTLY COMBINED BUT COVERING 7/30/03 TO 12/31/03: These reports appear to show \$15,084 in contributions but do not show or disclose sufficient information to determine how many are itemized and how many are not itemized and whether all itemized over \$200 have been disclosed as to amount, name, address, occupation and employer. The Commission has asked twice in letters dated March 16, 2004 and May 4, 2004 for that information. The public records disclose that at the time of filing this complaint, no response has yet been filed in response to these two requests.
3. REPORT COVERING 1/1/04 TO 3/31/04: This report shows \$16,053.69 as itemized receipts but discloses the source of only \$10,390 (\$5,400 from individuals and \$4,990 from the candidate). Reference is noted to the Commission's letter dated June 10, 2004 to which as of the date of this letter, the public records does not disclose that any reply has been filed by the Morse Committee. Thus, this report also appears not to qualify with the disclosure requirements.
4. REPORT COVERING 4/1/04 TO 6/30/04: Although filed 24 days late, the report still fails to properly report the source of contributions to the Morse Committee as required by law. The report shows \$102,854 in contributions for the period and lists that all such contributions are itemized (over \$200). Yet the report discloses the source of only \$6,630 of the \$102,854. As noted above, this report also fails to properly disclose the sources.
5. SUMMARY: The Morse Committee continues to ignore the reporting requirements even after numerous Commission complaints. Such flagrant disregard of the law and the Commission requests demands sanctions and an audit by the Commission.

B. EXPENDITURES

1. REPORTS COVERING 10/1/03 TO 12/31/03 AMENDED YEAR END: On Schedule B (unnumbered page), the Morse Committee lists an expenditure on 10/04/03 to the Boston Globe Newspaper for an advertisement in the amount of \$3,000. This ad's size was a quarter page. The ad ran on Monday, March 29, 2004. In reply to our call to The Boston Globe Advertising Department, we were informed by them that the charge for a ¼ page political ad was \$11,529.

Thus, given the wide difference between the \$3,000 figure reported to the Commission and the cost reported to us by the Globe Advertising Department,

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this leaves a concern about the accuracy of the Morse Committee's report.
We request an audit of the Morse Committee.

2. GENERALLY

We are also concerned that other expenditures are not being itemized even when the cumulative expenditure is over \$200. For instance, our campaign has noticed candidate signs but can find no expenditure for signs. Also, the campaign has an office but finds no expenditure during the last year for telephones. These are just two more examples of why we feel an audit of the Morse Committee is in order.

C. CONCLUSION:

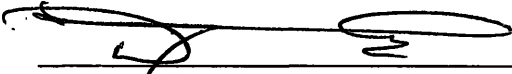
For the reasons listed above, 1) insufficient information on contributions and 2) questions on expenditures, we request that the Commission commence investigation under its complaint procedure. Given the past conduct of this Committee, it appears that without affirmative action by the Commission, reporting violations will continue.

Please feel free to contact me at the telephone number and address on this letterhead.

Very truly yours,


William H. Shaevel

On this 27th day of August, 2004, before me, the undersigned notary public, personally appeared William H. Shaevel as attorney in fact for Barney Frank for Congress Committee, the principal, proved to me through satisfactory evidence of identification, which was personal knowledge of identity, to be the person whose name is signed on the preceding document, and who signed and sworn to before me that the contents of the document are truthful and accurate to the best of his knowledge and belief.


Notary's signature

8-4-2006
My commission expires